



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

January 10, 2011

NMAAHC Tier II Draft EIS Comments,
c/o AECOM
675 N Washington Street
Suite 300
Alexandria, VA 22314

Re: Smithsonian Institution National Museum of African American History and Culture
Tier II Draft Environmental Impact Statement, November 2010 # 20100441

Dear Sir/Madam:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) offers the following comments regarding the National Museum of African American History and Culture Tier II Draft Environmental Impact Statement (DEIS). This Tier II DEIS supplements the Tier I Final EIS completed in 2008. In our February 4, 2008 letter, EPA rated the environmental impacts of the Tier I DEIS as "EC" (Environmental Concerns) and the adequacy of the impact statement as "2" (Insufficient Information). In our July 21, 2008 letter on the Tier I Final EIS, EPA stated that issues were addressed, though response to EPA concerns on Environmental Justice analysis remained outstanding; these comments have also not been fully addressed in this document. Based on our review, we rate this document an "LO" (Lack of Objections).

Project Purpose:

The Smithsonian Institution is proposing to construct and operate a permanent facility for the National Museum of African American History and Culture (NMAAHC) on a five-acre parcel on the Washington Monument Grounds and the National Mall. Although the NMAAHC currently exists in the form of exhibits displayed within other Smithsonian Museums, there is no permanent exhibition facility dedicated to its collection and programs. The National Capital Planning Commission (NCPC) is the lead federal agency.

Alternatives:

This DEIS evaluates four action alternatives and a No Build Alternative. The four action alternatives demonstrate different approaches to massing, location, and landscape treatment. The Section 106 process of the National Historic Preservation Act is being undertaken concurrently with this EIS process. There are several features of the proposed museum that are common to



the action alternatives: primary building form, pedestrian and service access and sustainability. The Smithsonian Institution has committed to a minimum level of Gold for the building as certified by the U. S. Green Building Council. The museum is also registered as a pilot project under the Sustainable Sites Initiative (SITES). The four build alternatives are: 1) Plinth Concept, 2) Plaza Concept, 3) Pavilion concept, and 4) Refined Pavilion Concept.

According to this DEIS none of the alternatives would have a significant impact on land use and planning policies, visitor use and experience, geology, soils and groundwater, global climate change, or stormwater runoff. Impacts would be related to historic resources and include historic views and vistas, special organization, distinctive historic planning features, topography, vegetation, buildings and structures. Impacts would also be to open space, mature trees, and increased pedestrian traffic at intersections.

The project team should work closely with the National Park Service and coordinate this effort with the plan for the National Mall and to continue to avoid and minimize impacts.

The plan relies upon the Environmental Justice assessment conducted in the Tier I document as a basis for the assessment in this document. The Tier I document has determined that, "the construction and operation of the NMAAHC facility would not significantly impact local economic development, community services such as schools, fire and rescue services or hospitals and it would not significantly impact environmental justice populations or children". However, as expressed in our previous letter of July 21, 2008, the Tier I document may not have examined the potential for adverse impacts upon communities of concern in a truly comprehensive manner. The complexity of this project makes it imperative that the assessment examine the potential for impacts upon communities of concern from the standpoint of risk, exposures to fugitive dusts, traffic related impacts, noise, business and transportation disruptions, utilities service disruptions, and other services that may impact the populations in the study area. There were questions and concerns expressed previously regarding the identification of at-risk populations, the assessment and identification of impacts, and the localization of given impacts in a manner that allows for the assessments of multiple impacts or exposures occurring in a given locality during the construction of this facility.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Ms. Barbara Okorn at (215)814-3330.

Sincerely,



Barbara Rudnick
Office of Environmental Programs
NEPA Team Leader

